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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INNA GUDAVADZE, LIANA ZHMOTOVA and IYA :
PATARKATSISHVILI, :
: Plaintiffs,
v. : 08-civ-3363 (RJS)
: FRCP 7.1
JOSEPH KAY (A/K/A JOSEPH KAKALASHVILI, A/K/A :
JOSEPH KEJ, A/K/A IOSEB KAKALASHVILI, A/K/A :
IOSEB KAKIASHVILI) AND EMANUEL ZELTSER, :
: DISCLOSURE
Defendants. :
STATEMENT
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DISCLOSURE STATEMENT UNDER FRCP 7.1

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and
Magistrate Judges of the Court to evaluate possible disqualification or recusal, the
undersigned counsel for Plaintiffs states as follows:

All Plaintiffs are individuals and not corporate entities. As such, there are no disclosures required under Rule 7.1.

Dated: New York, New York
April 4, 2008

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

By: /s/ Christopher K. Tahbaz
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